

Presented at hearing 3 July 2019 by M Baan

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BEFORE THE CENTRAL OTAGO DISTRICT COUNCIL

IN THE MATTER OF Proposed Private Plan Change 13 to the Central
Otago Operative District Plan

REQUESTOR RIVER TERRACES DEVELOPMENTS LTD

SUMMARY EVIDENCE of Marilyn Hight Brown for
The Central Otago District Council (Further Submitter #506)

and

Greg and Vivienne Wilkinson (Submitter # 396)

Dated: 30 June, 2019.

1. My name is Marilyn Hight Brown.
2. My qualifications and experience are as detailed in my primary evidence prepared for this Hearing and dated 20 May, 2019. I have complied with the Code of Conduct for Expert Witnesses contained in the Environment Court Consolidated Practice Note 2014. This evidence is within my area of expertise, except where I state that I am relying on another person, and I have not omitted to consider any material facts known to me that might alter or detract from the opinions I express.
3. This evidence further addresses the potential yield and infill development enabled by the Operative District Plan. It also further updates the situation as I understand it in regard to the potential greenfield locations within urban Cromwell and notes current trends in reduced allotment sizes and emerging changes to typologies, together with some recent building consent data.
4. This information shows:
 - a steady and progressive rate of development, including that of infill
 - interest within the development community for the estimated yields shown in the Spatial Plan with the reasonable expectation, in my view, that proposals now in train will now further progress by way of application for resource consents or Plan Changes (in addition to changes that may be Council- initiated).
5. I explain this with reference to the yield update shown in **Attachment 1**.
6. I also address Ms. Hampson's Summary Evidence of 10 June in the context of the further information mentioned in para 3 above and her view that PPC 13 (together with Cromwell's outer settlements) are appropriately considered as an urban environment under the NPS-UDC, and her supplementary evidence of 28 June, 2019.
7. I then turn to Mr. Brown's Supplementary Evidence of 28 June, 2019.
8. Before discussing these matters I wish to reiterate that as stated in my primary evidence at para 6.5.4 *"I make no judgement about the [ME Consulting] assessment [that additional dwellings will be needed on the basis of approximately 108 dwellings p/a in the period 2016 -2028, and approximately 86 additional dwellings p/a if factored over the 2106-2043]"*.
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9. At para 32(a) of her Summary Evidence (10 June) Ms. Hampton states that I *"adopt her estimates for residential demand growth"*. That is not correct: then as now the above estimates are included only to provide convenient cross reference to potential yield expectation and ODP matters, in the context of the Spatial Plan.

10. As I understand it Ms. Hampson's more recent demand analysis shown in Figure 1 of her summary evidence shows a slightly reduced demand for additional dwellings compared to the levels referred to in para 7. At either level:
 - a) there is predicted adequate development/supply to around 2033, providing an adequate time to further monitor trends and adjust policy and implementation measures accordingly
 - b) the indicative Spatial Plan yields are considerably more than that as assessed by Ms. Hampson. This is because we differ about the yield anticipated for the urban greenfield sites, potential infill and the Freeway Orchard and golf course.
11. In my Memorandum of 7 June, 2019 I comment on the indicative Spatial Plan and ODP yields. I note that I consider the ODP provisions one indication of yield and have provided this assessment for comparison as a desk top analysis. For the reasons outlined in Section 11 to my Memorandum I prefer to rely on the Spatial Plan indicators as now amended by the yield information shown **Attachment 1**.

Current knowledge: reducing sizes of allotments/increased density of development.

The Gair Ave site

11. There are 80 allotments within the current Stage 5 of the **Gair Ave subdivision** with parcels typically ranging in size from 345m², 416-480m² and 505-580m². There are 4 larger allotments adjoining the Stage 4 area that are end of cul de sac 715m²(net), and 689m² and 825m² parcels. These parcels are a transition between the larger lot sizes of earlier parts of the Gair Ave site. Overall there has been a successive reduction in lot sizes and thus an increased density of development over the past 10-15 years as the subdivision has progressed.¹ I anticipate this trend will continue.
12. In the north east corner of Stage 5 area 3 parcels have been reconfigured to to 1600m² to enable development of six 1-2 bedroom apartments, on sites that are 213, 221, 224, 226 and 307 m² per parcel.
13. A draft plan has been prepared for the Gair Ave final stage (Stage 6) so that the roading design could be integrated with areas already subdivided prior to further assessment of the allotment configurations within the 5.1ha balance area.

¹ Pers. Comm. Mike Kerr Property Manager CODC 28 June 2019

14. The interim plan shows 97 allotments (typically 345 - 473m²), and four 'edge' configuration lots sized between 720-c.800m².
15. A number of the possible 354-473m² allotments would, if combined as above, enable a similar development to the apartments mentioned in para 12. It therefore appears reasonable to assume say two other multi-unit developments within Stage 6 giving a total of 103 allotments.
16. There is also the possibility that Stage 6 as a whole will have smaller allotments than those currently indicated, for an increased yield overall.
17. With reference to **Attachment 1** and comparing column 2 with columns 4 and 5 (L>.R) it can be seen that the Gair Ave final stage is more than the indicative Spatial Plan 'high' yield, and lower than the hypothetical ODP yield if subdivided to 250m² parcels. The attached typologies and associated parcel sizes of the multi-unit projects described utilise 'the 250m² Rule in enabling attached typologies/increased densities (and as mentioned in Section 6 of my Memorandum of 7 June, 2019.

Top 10 Holiday Park

18. The consented allotment plan for the former **Top 10 Holiday Park** has 175 residential lots two of which have a no-build restriction to enable access from the Freeway Orchard site. Residential Lots 1-173 are in the range of c.380m², 500-560m², 600-c.650m². The larger sites have frontage to Alpha St or are along parts of the northern perimeter. Some 20 allotments are sized at or slightly above 250m² also indicating potential for attached and semi-detached typologies.

Sew Hoy Estate

19. A recent desk top analysis to correlate possible yield to the density scenarios envisaged in the Spatial Plan showed an indicative yield of 379 allotments (approximately 50% greater than the ODP approved 251 allotments), and within mid-range of the 330-440 low-high yield values of the shown within the 800m and beyond distance from the town centre.
20. The yield scenario was achieved over a range of site sizes for densities between 11.8/d/ha, 13.9/d/ha and 16.2 d/ha, with attached typologies closer to the town centre, grading out to lesser densities at further distance.
21. This type of concept planning is an integrated response to the walkable catchment of the town centre environs, and to the lesser densities existing further beyond.
22. It is a pattern of development also likely to occur as the walkable catchment to other nodal points of the Spatial Plan are developed/enhanced. These nodes include the Arts and Culture Precinct, McNulty Inlet and other lakeshore access points within North Cromwell, recreation clusters and so on.

23. The nodal development structure is shown as '**Key Places for People' and 'Key Landscape and Open Space Features** shown at pages 39 and 40 of the adopted Spatial Plan, and as **Figure 8 and 9** to my Supplementary Evidence of 21 June , 2019.

Golden View Lifestyle Village

24. The recently completed Golden View Lifestyle Village, adjoining the Sew Hoy land has a density of 15.6 d/ha. This correlates with the expectation of 15-20 d/ha within the walkable catchment to the town centre.

The Chalets site.

25. As a holiday park/short –term accommodation facility the Chalets site is perhaps better described as an infill location rather than a greenfield site. However categorized, this site sits among single family dwellings within Cromwell East and is considered to have potential for mixed typologies and densities ranging between 10-15d/ha. For comparison purposes **Attachment 2** shows that this density could also be achieved for detached dwellings in a conventional 50-lot subdivision.
26. Although Ms. Hampson agrees with a possible yield of 32-48 dwellings (refer Column 3 **Attachment)** she considers '*the Chalets site is not an area of high amenity. The ability to subdivide to 250m² in this zone has been in place for some time and no large site that I am aware of has opted for this blanket outcome*'. This discussion occurs in the context of the reliability or otherwise of an ODP- enabled yield. I return to this issue and that of Ms. Hampson's infill assessment below.
27. I consider the Chalets site has very good development potential due its size, configuration, the existing multi-unit usage and location: indicating that it is capable of a yield correlating with the Spatial Plan if not above. I would see its redevelopment as attached and other typologies at 2 or more floors possibly also with a common outdoor area.

Expectations overall.

28. I understand that the owners of the Sew Hoy and Freeway Orchard greenfield sites are presently considering the additional development potential of their sites following the adoption of the Spatial Plan, indicatively at the densities anticipated therein. In this regard CODC counsel Ms. Caunter has referred to discussions between the landowners and Council.
29. These discussions are one of a number of work streams underway to continue processes associated with the Cromwell Masterplan and as to the development of updated zoning provisions.

29. In regard to the Freeway Orchard site I note that this area is now a remnant pocket of the Rural Zone adjoining a substantial population within the 10 min walkable catchment to the town centre. I consider this site has many parallels with the consented Top 10 Holiday Park and concur with Mr. Whitney's expectation of development as mentioned at Section 7.1.2 of the s 42 Report.
30. I envisage the development trends noted would ~~not~~ in the medium to longer term, also result in the development of the golf course and some, if not all outer perimeter locations within the town centre.
31. These expectations are included to the fourth column of the yield table at **Attachment 1.**

CODC Building Consents

32. The CODC building consents data for the Cromwell Ward² between FY's 2013- 2108 show a total of 953 new dwellings and new units, thus a growth rate of c.190 new dwellings and multi-units/year.

TABLE 1: CROMWELL WARD BUILDING CONSENTS DATA 2013-2018

Residential activity	Building consents
New dwellings	910
Multi-unit	43
Subtotal	953 (c.190/year)
Dwelling alterations- internal	127
Dwelling alterations and additions.	145
Relocate dwelling onto site	38
Relocate dwelling offsite	1
Residential new sleep out	13
Residential new garage/sleep out	18
Residential domestic demolition	2
Residential outbuilding relocated on site	7
Residential outbuilding relocated off site	1
Total	1305

33. The data also shows a range of other residential activity including alterations and additions, sleep outs, removals on and off site and so on. While only 2 demolitions are recorded the alterations and additions activity is approximately 30% of new development.
34. Taken overall new construction and the adaptation of dwellings is ongoing with growth accommodated over the past 5 years to a higher level than that of the demand scenarios as assessed by ME³, albeit that the ME figures are for assessed demand for Cromwell and surrounds.⁴

² The Cromwell, Outer Cromwell and Cromwell Rural CAU

³ The ME Consulting Economic 2107 (Document 5, page 21)

⁴ The Cromwell, Outer Cromwell CAU: (check ME 2017 reference: ME 2017 report

35. While the assessment of market influences are not my expertise I note that it is not known whether this rate of growth would be sustained at the level assessed by ME Consulting, or at some other level.
36. The growth rates as presently understood should in my view be reassessed when the latest Census is released, and further information on housing affordability, typology preferences and take up which are included the current CMP work streams is known. This information will need to also be aligned with factors such as the regional and national economic outlook, internal and external migration factors, updated employment data, visitor and tourism trends, climate change influences and so on.

Considerations of yield and response

37. Ms. Hampson's Figure 1 to her Summary Evidence of 10 June shows housing demand for a total of 2322 dwellings⁵ across various timeframes as follows:
- | | | |
|---|----------------------------|------------------------------------|
| - | the 10yr period 2018 -2028 | 972 dwellings (97dwellings/yr.) |
| - | 5yr period 2028-33 | 338 dwellings (67.6 dwellings/yr.) |
| - | 10yr period 2033-43 | 607 dwellings (60.7 dwelling/yr.) |
| - | 5-yr period 2043-48 | 405 dwellings (81/yr.). |
38. Ms. Hampson notes at para 28 of her Summary Evidence "*when viewed in this way the graph suggests that PC 13 would help address a long term shortfall of capacity based on what is currently able to be estimated through the ODP and what I believe to be the yield for some greenfield sites and redevelopment potential*"⁶.
39. The indicative yield shown in the 4th and 5th columns of **Attachment 1** (the Spatial Plan and ODP columns) for the rural and urban greenfield sites is as follows:
Greenfield within ODP residential zones: 670-750 (rounded)
Greenfield within ODP Rural zones: 710-880
1,386-1,557
Thus indicatively about 1380-1550 dwellings.
Top 10 + Wooing Tree 473- 573 u
For overall greenfield 1,859 – 2,130.
38. The greenfield yield expectation is therefore at the midrange of the demand scenario for the periods 2018-2043 shown in para 37 (972+338+607 = 1917).
39. Such yield does not include infill, town centre or the take up of zoned land within the Outer Settlements.
40. Given the correlation between the demand estimated for the next 10 years and the '900 cap'⁷ of the PPC 13 proposals it would appear that the Plan Change may detrimentally impact on the delivery of the Spatial Plan and a consolidated form of development /walkable community .i.e. substitute one for the other.

⁵ This scenario is lower than those shown i at the bottom of **Attachment 1**.

⁶ This is on the basis 840 dwellings within PPC13, rather than a 900 cap.

⁷ Does not assume possible further subdivision by way of resource consent

Possible churn/infill

40. In assessing the effect of infill in accommodating growth Ms. Hampson distinguishes between new development on vacant sites, and redevelopment. In comparison the Spatial Plan assessment of 'infill' covered both situations. I have therefore included both vacant infill and redevelopment to the third column "Ms. Hampson" in **Attachment 1**.
41. Due to the rate of development shown **Table 1** above. I then **discount** Ms. Hampson's vacant infill of 80 dwellings⁸ as it appears that these sections will have already been utilised. If this assumption is incorrect then there is only a minor effect to the estimated yield shown.
42. At para 26 Ms. Hampson notes '*I would expect little or no incentive to redevelop sites [as infill/churn] as they would be competing with the greenfield developments for a similar product*'.
43. I am of the view that is reasonable to assume infill within currently developed areas. This is essentially a continuation of current trends and is a normal expectation within a residential environment
44. CODC information on churn within East and West Cromwell (January 2018 – present) shows a rate of churn at approximately:
- 38 allotments for 37 dwelling units in Cromwell East and
 - 33 allotments creating 27 dwelling units in Cromwell West⁹.
45. This is a higher yield than shown for the planning horizon and If it continues then the 20% churn factor as per the Spatial Plan may need to be revised upwards.
46. In Cromwell East recently consented infill development includes an amalgamation and re-subdivision to 6 lots sized between 260 and 350m² for 6 apartments in Donegal St, replacing two existing dwellings . On a vacant site in Barry Ave near the town centre 8 lots have recently been consented for 2-3 bed apartments sized between 165-178m² .
47. In Cromwell North (the developed area north of SH8B and the Shortcut Rd vicinities) the Spatial Plan yield is 90-135 (over the planning period) or from 22-360 with the caveats as shown for Column 5) keeping in mind that part of this area is in the walkable catchment to the town centre, and other parts are conveniently located to the McNulty Inlet activity node.
48. A 19-unit development has been granted consent in Shortcut Rd, this development containing five 4-bed apartments, thirteen 1 bedroom apartments and a manager's unit.

⁸ Included to the ME2017 report

⁹ These figures exclude some 28 Golden View Life stlye Villas

49. The extent of infill to properties in Cromwell east and West anticipated by Ms. Hampson is considerably lower than that shown in the Spatial Plan as she anticipates the new building stock will derive principally from greenfield supply. While that is true due to overall acreage involved I consider infill will be an important component of 'growth within existing Cromwell'
50. I consider the churn/infill as per the Spatial Plan a reasonable expectation due to;
- a) the 30-yr timeframe
 - b) a proportion of the housing stock in Cromwell East and Cromwell West is reaching an age where we would expect renewal to occur more extensively than currently
 - c) these areas, and Cromwell North, have excellent connectivity to the town centre, schools and other planned activity nodes of the Spatial Plan including the lakeshore nodes at McNulty Inlet and near the western end of the Cromwell bridge/SH 8B
 - d) the 20% rate of churn indicates renewal to achieve 10-14 dwellings per year for Cromwell East and 9-12 dwellings per year for Cromwell West. For Cromwell North the anticipated churn/infill is 3-4.5 dwellings per year.
 - e) the existing urban environment has a high standard of amenity which will be supplemented by other attributes developed under the Spatial Plan, including a more diversified housing stock. This is expected to facilitate the further development in the three infill locations.
51. Churn/infill does not necessarily involve demolition, and the above factors may prompt the consideration of more intensive use of properties, renovation to achieve increased footprint by higher coverage, and upper floors for example.
52. Other factors may be adjacent ownership where say two or three properties are jointly owned, enabling more flexibility in redevelopment footprints and/or adaptive reuse.
53. For all of these reasons I hold a different view to that of Ms. Hampson at paras 35 and 36 of her Summary Evidence.

PPC13 and possible relationship to the greenfield yields anticipated by the Spatial Plan

51. At para 29 and 30 Ms. Hampson (summary evidence 10 June) refers to the issue of supply and timing of development i.e. the certainty¹⁰ of PPC 13 compared to the processes required under the RMA to implement the Spatial Plan. I comment as follows:

¹⁰ In her assessment

- a) if Proposed Plan Change 13 is approved any Appeal proceedings (if lodged) may create a similar time frame to that of the CODC initiated changes to District Plan. While there may also be Appeals against the latter (or on decisions on resource consents, if applicable) Council Plan Changes are expected to be aligned with the Spatial Plan on which there has already been community engagement, and correlates with the community's preferred option to accommodate growth and aspirations as reflected in the CMP Vision
- b) the work undertaken on the Spatial Plan to date will assist the s32 analysis which is an integral component of a Plan Change and/or Review process, expediting this statutory requirement and the process overall. I do not agree with Mr. Brown's comment that the Spatial Plan has not investigated options or alternatives. As discussed below the Spatial Plan is not a Plan Change with the obligations set out in Section 32, RMA. It does however provide for growth enabling integrated development within or adjacent Cromwell's urban fabric, taking an integrated approach to the use, development or protection of land and associated natural and physical resources. Accordingly it gives due weight to both rural and urban resources and the management thereof (in my view)
- c) the Sew Hoy estate, Gair Ave estate, the Chalets and north Cromwell greenfield locations are already **residentially zoned**. This contrasts with the Rural Resource Area zoning of the PPC 13 zone. As noted by Mr. Whitney ¹¹ the consents granted for the Top10 Holiday Park create a precedent for urban development on the Freeway Orchard site, and also the Golf Course site.
- d) there is an adequate 'window of opportunity' to address issues and solutions for the sustainable management of natural and physical resources of both urban and rural environments¹² and for integrated management¹³ (as per b above) in the short to medium term rather than the immediate time frame the Requestor considers necessary.
- e) among the matters to be taken into account are the objectives and policies of the Partially Operative Otago Regional Policy Statement. These matters are discussed in Section 9.3.5 of the Section 42 report. I agree with Mr. Whitney's conclusions that PPC13 *does not provide for urban growth in a strategic and coordinated way*¹⁴. I consider the development

¹¹ para ... of the Section 42 Report

¹² as to Part 2 RMA matters

¹³ As to Section 31 (1) (a)RMA

¹⁴ Page 80

opportunities identified in the Spatial Plan are consistent with Objectives 4.5 and Policy 4.5.1¹⁵ of the Partially Operative Regional Policy Statement

- f) Plan Changes for the greenfield locations would also be consistent with Policy 4.5.1(a) “ensuring future growth areas are in accordance with any future development strategy for that district”
- g) As noted at para 63 of my Supplementary Evidence I do not consider PPC 13 accords with the Spatial Plan (or with Objective 4.5. and Policy 4.5.1 . Of these matters (a),(f), (g) and (h) are particularly significant in the assessment of PPC 13.
- h) I agree with Mr. Whitney’s conclusions as to PORPS Policy 4.5.3 (a, b, d, e f i). The localised noise environment, other reverse sensitivity impacts, and rural productive setting that are the immediate surrounds of the PPC 13 site are likely to negate outdoor amenity. I accept that natural hazard risk can be appropriately avoided, remedied or mitigated
- i) Policy 4.5.2¹⁶ looks to achieve the strategic integration of infrastructure with land use. I do not think PPC 13 achieves this, given the efficiencies I would assume achieved both in provision and ongoing supply to urban development that is already serviced, or in close proximity to, existing services.
- j) I agree with Mr. Whitney’s summation as to Objective 5.3 and Policy 5.3.1 addressing rural activities. I note in particular subparagraph f “*providing for other activities that have a functional need to locate in rural areas*”. In my view there is no need to locate medium to high density residential development within the Rural Resource Area within which PPC 13 is located.
- k) The ODP, Spatial Plan, and its associated implementation processes provide adequate opportunity for development in accordance with Policy 5.3.1.

Remaining issues as to future expectations

- 52. There are two remaining issues addressed by Ms. Hampson about infill para 35,36) these being that zoning does correlate with supply and that the infill examples shown in the Spatial Plan do not correlate with anticipated densities/would require significant demolition.
- 53. I comment as follows:

¹⁵ See pages 79 and 80, Section 42 Report

¹⁶ Ibid, page 81,

- a) the infill examples shown in Figures 12.1 and 12.2 to my Primary Evidence are just that. They were an early part of the Spatial Plan development and provide an illustration of how infill may occur over a 1 ha area. The densities Shown are specific to the example, including existing dwelling numbers and placement. They are but one scenario among others not shown.
- b) the Spatial Plan low-high yields included to 7 June Memorandum Table 4 and **Attachment 1 to this summary evidence** are based on densities considered appropriate to the connectivity factors and walkable catchments included to the Spatial Plan within generally accepted density targets and typologies for town centre and other environs further afield
- c) I agree that zoning provisions do not ensure development and/or supply. Such measures are however a recognised planning approach and endorsed by statute. They represent opportunities that may be taken up by individuals, businesses and various other agencies within the private and public sectors, community trusts, the government, joint venture agencies and the like.
- d) As to timing and readiness of PPC13 compared to zoning provisions I have commented on these matters in para 51 (d) above.

What may constitute an urban environment under the NPS -UDC

- 54. As noted in the s42 Report *“the Central Otago District does not contain any high-growth urban area or medium growth urban area as defined in the NPS –UDC”*. This is because Cromwell does not contain a population of 10,000 people.
- 55. It may do so in the future - however as presently understood that 10,000 threshold for the Cromwell Ward is approximately 20 years hence (and possibly more distant for the Cromwell urban area). Therefore in my reading of the NPS-UDC the Council does not have an obligation to provide for growth at a level equating with a 15% additional capacity for urban growth. Since Objectives OA1-3, OB1, OAC1-2 and OD1-2, and the associated Policies PA1-4 D are also couched in terms of ‘urban environments’ these are similarly considered not applicable.
- 56. Whether or not the NPS –UDC applies Section 31 (1) (aa) of the RMA is notes *“the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district”*.
- 57. in my reading of the NPs-UDC the evaluation of the time frame in which it may be applicable is influenced by the extent to which the township of Cromwell may be considered an urban environment: such environment being defined as **‘urban environment means an area of land containing or intended to contain a concentrated settlement [emphasis added] of 10,000 people or more and any associated business land irrespective of local authority’**.

- 58.. The preamble to the NPS states *“Urban environments are characterised by the **closeness of people and places**, and the connections between them. They enable us **to live ,work and play in close proximity** giving us access to amenity, services and activities that people value. While urban environments share these common characteristics they also have unique local variations ; the traits that make one urban environment different from another. Urban environments often have high rates of population and economic growth. Reflecting this, they are dynamic and are constantly changing to meet the needs of their communities.....”*
59. For the reasons explained at Section 4.2 of my Primary Evidence it is my view that the urban environment of Cromwell correlates to the area to the north and north east of the Cemetery Rd vicinity, east of Sh6 , is bounded to the north east by Lake Dunstan and to the east and south by the Kawarau Arm. To me ‘concentrated’ implies a cohesive whole, is often contiguous and/or in immediate proximity .
60. I don’t consider that the Outer Settlements are part of the Cromwell urban environment, or that PPC13 would engender some similarities in residential development. I have already addressed the historical development and today’s aspirations of the communities who live there as expressed in feedback on the Let’s Talk Options survey and the CMP Vision workshops. .
61. Ms. Hampson is of the view that the outlying settlements are a part of Cromwell’s urban environment, and in the same manner that the PPC13 development could and should be considered as part of the urban environment. She suggests there is precedent for this approach in the Queenstown growth strategy and in a number of other locations.
62. What is unique about Cromwell in my view are the close inter-dependencies of the rural frame (and the associated productive environment, including important amenity, landscape and heritage values), to the town within it,. Such that the aspirations for CMP, and Spatial Plan, were for urban containment.
63. Ms. Hampson at para 39 states *‘ultimately it is for Council to decide what the Cromwell urban environment is. In adopting the Spatial Plan Council has confirmed a strategy to consolidate and contain the urban environment substantially within or directly adjacent to the existing residentially zoned land of the township.*

Ms. Hampson’s Supplementary Evidence dated 28 June 2019.

64. I do not intend to further itemize and respond to this evidence; I consider the points raised have been largely responded in this evidence.
65. I have provided as much information as is available on the intended progression of the Spatial Plan and integration with other work streams including those linking to the ongoing CMP process.

67. A Spatial Plan is not an exercise in demand and supply. To suggest these market factors should equate with anticipated yield in the manner of an economic analysis is inappropriate in my opinion, if that is the correct interpretation of Ms. Hampson's para 4-7.
68. I refer to the MfE description of spatial planning in a 2010 discussion document¹⁷ "*Spatial planning – a generic definition*."

A spatial plan is a high-level strategy for developing a region that relates to its geography, and seeks to achieve desired broad outcomes. Developed and implemented via collaboration between multiple parties, it provides a mechanism for agreeing joint priorities, actions and investment. Spatial planning is:

- *multi-party – a tool for collaboration between the key decision-makers.*
- *focused on the long-term development of cities and regions and improving investment certainty*
- *a guide to the location and timing of future infrastructure, services and investment that can be used to provide for the co-location of infrastructure where this is appropriate*
- *evidence based*
- *Integrated across sectors – e.g., transport, land use, housing, education, funding policy and regulatory policy – to achieve broad outcomes (economic, social, environmental, and cultural)*
- *strategic – provides direction to regional funding policy, regulation and other implementation plans (egg, transport, economic development).*

Spatial planning is not:

- *prescriptive regulation*
- *only about land use".*

69. A Spatial Plan will also typically
- identify development that meets the needs of local communities
 - promote regeneration and renewal
 - promote effective and consistent decision-making, the appropriate use of land, buildings and infrastructure

¹⁷ MfE Building Competitive Cities *Reform of the Urban and Infrastructure Planning System A Discussion Document 2010 page 37.*

- a more compact urban form
- recognising and conserving important environmental, historic and cultural resources.

70. As per the CMP/Better Business Case the Spatial Plan has been derived on a collaborative basis and is supported by the Cromwell community.

Supplementary evidence of Jeffery Brown

71. Mr Brown refers at para 19 and 20 to the NPS-UDC and supports the view of Ms Hampson. I have already referred to these matters.

72. Mr Brown acknowledges the validity of Spatial Planning in para 6 and I concur.

73. With respect the conclusions reached by Mr Brown that 'there has been no analysis of alternative options' this is incorrect and is described in some detail in Mr Guy's evidence and in my Supplementary Evidence

74. A spatial plan as a high level document is as much about placemaking/sense of place from an urban design perspective as it is a growth management strategy. As is referenced above it is not 'only about land use "[or enablement in terms of an Operative Plan). In my view the Spatial Plan is supported by the Cromwell community, as illustrated by the submissions and attendance at this hearing.

Marilyn Brown
2 July, 2019

ATTACHMENT 1 _ YIELD TABLE : FURTHER COMPARISONS (updated from the Minute to Commissioners,7 June, 2019 + more recent information and incorporating Ms Hampson's summary evidence)				
Residential site	Spatial Plan low and high yields (as estimated Table 4 of Memorandum, 7 June, 2019 , (4th column)	Ms Hampson	Anticipated yields following adoption of Spatial Plan and/or more recent information	Hypothetical ODP or other yield
Existing consented sites	Top 10 Holiday Park 173 Wooving Tree: PC 12 210*	180 210	173 300- 400	173 210
	383	390	473- 573	383
	Sew Hoy Estate 330--440 Gair Ave final 40 --60 The Chalets 32--48 Nth Cromwell 150--225	251** 40-60 32-48 75	379*** 97-103 50 150--225****	251** 160 128 75 -150
	552 --773	398 -434	676 -757	614 -689
Town Centre	N W Precinct and other locations 132--176	48 ('R')	3 sites: 48 ('R'), 48-64 ('BA1'), 48 -64 (u/z 'BA1')	3 sites: 48 ('R'), 48-64 ('BA1') 48 -64 (u/z 'BA1')
	132--176	48	146- 176	144 or 176
Possible churn/infill (over 30yrs)		+80 48-64 (other)		
Cromwell East	315--420	150-180	600*****	840
Cromwell West	270--360	50-70	450*****	720
Cromwell North	90-- 135	(??)	90-135	22 - 360*****
	675 -- 915	248 -- 314 (?)	1142- 1185	1,582 -1,920
Outer Settlements	Bannockburn 110---140 Pisa Moorings 70--100 Lowburn 25--30	140 68 26	110-140 70- 100 25 - 30	140 68 26
	205 -270	234	205 -270	234
Total Urban zoned	1,947--2517	1,318- 1,420	2,642- 2,961	2,957 -3,354
OPD Greenfield Rural Zones	Golf Course 510-680 Freeway Orchard 70-106	Not counted	510-680 c.200	510-680 c 200.
Total Rural zoned	580--786	0	710 - 880	710 - 880
Overall assessed yield	2,527- 3,303	1,318--1,420	3,352 -- 3841	3,667 -- 4, 234
Total hypothetical ODP or other yield				
Demand scenario if assessed @ ME ratios: 2018-2028: 1096 (10 yrs@108 dw/yr) 2028-2043: 1290 (15 yrs @86 dw/yr) 2386 or if assessed @ 86 d/yr: 2018- 2048: 2580				

* as aligning with Table 4, June 7 Information

** as consented

*** based on recent desk top analysis

**** there are opportunities for comprehensive masterplanning in this area which is shown at indicative 10-15 dwellings /ha , recognising the proximity to McNulty Inlet and associated nodal development.

***** at an assumed infill rate of 20/year for Cromwell East,and 15/year for Cromwell West

***** reflects both the current min 4000m² site requirement and yield if at 250m² per site development within the town centre walkable catchment



The Chalets Site - 102 Barry Ave, Cromwell – Area: 4.15 ha. as existing



Possible subdivision – 50 allotments average size 550-650m² @ approx. density 15 dwellings/ha.